



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Bunge North America (East), Inc. Indianapolis, Indiana

**FROM:** Valeria Apolinario, Environmental Engineer  
AECAB (MN/OH)

**THRU:** Brian Dickens, Section Supervisor  
AECAB (MN/OH)

**TO:** File

---

**BASIC INFORMATION**

**Facility Name:** Bunge North America (East), Inc.

**Facility Location:** 1102 West 18th Street, Indianapolis, IN 46202

**Date of Inspection:** October 27, 2022

**EPA Inspector(s):**

1. Valeria Apolinario, Environmental Engineer
2. Alexandra Letuchy, Environmental Engineer

**Other Attendees:**

1. Kurt Graham, IDEM, Environmental Engineer
2. Kendall Bergman, Bunge North America (East) Inc., Shipping and Receiving Manager
3. James Graham, Bunge North America (East) Inc., Regional Elevator Manager

**Contact Email Address:** [kendall.bergman@bunge.com](mailto:kendall.bergman@bunge.com)

**Purpose of Inspection:** to determine compliance with the facility's Federally Enforceable State Operating Permit (FESOP).

**Facility Type:** Grain Elevator

**Regulations Central to Inspection:** The FESOP for Bunge North America (East), Inc. (Bunge) requires the facility to conduct daily visual emission notations and pressure drop recordings of its baghouses. The acceptable pressure drop for each baghouse is between 1-10 inches of water

column (" w.c.). Bunge is also required to control fugitive emissions according to its fugitive dust plan, which includes the application of degummed soybean oil during bean bowl receiving operations and grain loadout. Bunge is required by its FESOP to perform daily visual checks that the oil is being spray applied to all processed grain for the bean bowl. Fugitives from roadways and parking areas are to be controlled by periodic sweeping or watering on an as needed basis.

**Arrival Time:** 2:42 PM

**Departure Time:** 4:53 PM

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet — provided via email
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Kendall Bergman and James Graham unless otherwise noted.

**Process Description:**

Bunge operates a grain elevator. Bunge receives grain through two separate grain receiving pits. Trucks dump grain into the receiving pits, and each pit is controlled by a baghouse to mitigate loose dust generated from the dumping process. These baghouses are referred to as the 'small RJ' and the 'large RJ'. The grain is then mechanically transferred through the grain legs to either the east tripper loader, west tripper loader, or the bean bowl conveying systems. The tripper loader equipment consists of both the tripper and loader conveying operations that work to transfer the grain from the grain legs into the silos. At the trippers, grain from the grain elevators is discharged onto a horizontal conveyer that moves the grain to the loader equipment. The loader equipment then loads the grain into its designated silo. Each tripper and loader are controlled by an aspiration filter, for a total of four filters associated with the tripper loader equipment; these filters are labeled as baghouses in the facility's FESOP.

Drag conveyors in the bean bowl conveying system transfer the grain into the bean bowl, a domed storage area separate from the silos. These drag conveyors are covered on all sides.

Bunge operates 55 silos and the one bean bowl for grain storage. Operators can change the direction of the flow of grain. Grain is loaded out from the silos and bean bowl into open-top trucks for shipping.

**Staff Interview:**

Bunge operates from 7:30am-5:00pm Monday-Friday during the non-harvest season and has seven employees. Staff stated during the inspection that oil application had halted due to the installation of the covered drag conveyors for bean bowl transferring operations in August 2022. Prior to this, the conveyor system was partially open, and oil was applied to the grain to suppress fugitive dust during transfer operations. When oil application was conducted, it was applied at the receiving pits. There are no controls utilized during loadout operations.

The facility had previously stack tested its baghouses in Spring of 2018 and is planning to conduct stack tests in Spring of 2023. A third-party conducts baghouse maintenance. An annual inspection is conducted to check the condition of the interior bags. Pressure drop is recorded daily for the baghouses through a manual check of the magnehelic gauges.

Bunge utilizes a skidsteer roadway sweeper for on-site sweeping. Bunge stated that roadway dust suppression application had not been conducted in the past year, but that it would be done next year. The facility has no water truck, so it does not conduct any roadway watering.

**TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Data Collected and Observations:**

Staff informed U.S. EPA that it was currently the ‘non-harvest’ season and that operations were less frequent than during the harvest season. Therefore, U.S. EPA did not see grain handling operations during the inspection. U.S. EPA did ask for records of the pressure drop recording and visible emission checks for each of the baghouses, which the facility provided. Each pressure drop reading was between 2-5” w.c. from the previous three weeks.

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were not taken during this inspection.

**CLOSING CONFERENCE**

☒ Provided U.S. EPA point of contact to the facility

**Requested documents:**

- A description of each of the baghouses at the facility and which emissions units or processes each baghouse controls.
- A diagram of the pick-up points for emissions.
- An explanation of which baghouse pressure drops were monitored in the monitoring logs that U.S. EPA reviewed: Truck Receiving Loaders Daily Monitoring Checks, East and West Tripper Daily Monitoring Checks, and East and West Loaders Daily Monitoring Check.

**Concerns:** U.S. EPA noted to the facility that the current FESOP and fugitive dust plan requires for oil to be applied as a dust suppressant for the bean bowl receiving conveyors and for grain loadout operations. U.S. EPA informed the facility that it may need to apply for a permit modification to IDEM to update the facility's current conveyor configuration and oil application termination.

The company provided the requested information on November 18, 2022.

**DIGITAL SIGNATURES**

Report Author: \_\_\_\_\_

Section Supervisor: \_\_\_\_\_ for Brian Dickens

**Facility Name:** Bunge North America (East), Inc.

**Facility Location:** 1102 West 18th Street, Indianapolis, IN 46202

**Date of Inspection:** October 27, 2022

**APPENDICES AND ATTACHMENTS**

- 1.* Appendix A: Digital Image Log

**Facility Name:** Bunge North America (East), Inc.

**Facility Location:** 1102 West 18th Street, Indianapolis, IN 46202

**Date of Inspection:** October 27, 2022

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Valeria Apolinario	<b>2. Archival Record Location:</b> Region 5 Electronic Records Center
--	--

<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. Time zone and DST)</b>	<b>Description of Image</b>
1	IMG_0279.JPG	2022:10:27 14:33:49	Loadout & Bean Bowl Daily Monitoring Checks
2	IMG_0280.JPG	2022:10:27 14:34:00	Truck Receiving Loaders Daily Monitoring Checks
3	IMG_0281.JPG	2022:10:27 15:35:58	East and West Tripper Daily Monitoring Checks
4	IMG_0282.JPG	2022:10:27 15:36:11	East and West Loaders Daily Monitoring Checks